

# Exhibit O

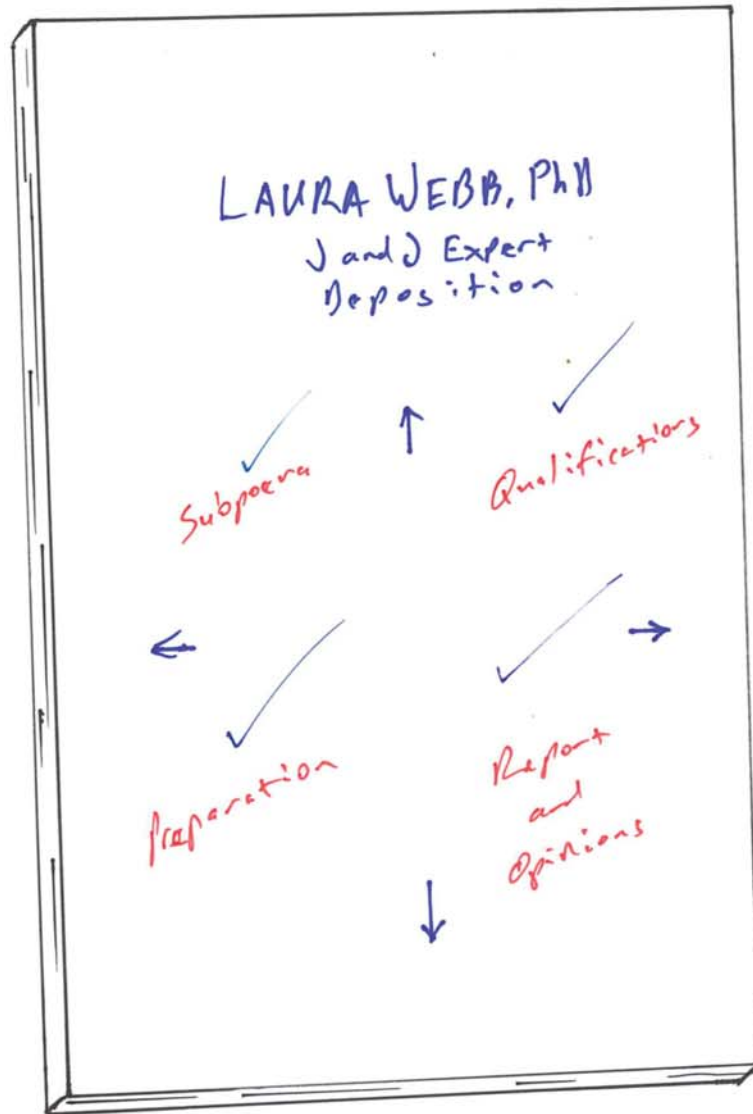
## Dr. Laura Webb: Activities Supporting Opinions

ACTIVITY	(YES)	(NO)
Ever work in a talc mine?		X
Ever design any talc mine operations?		X
Ever consult on any talc mine operations?		X
Ever design any drill core sampling protocols for any talc mines?		X
Ever design a blast hole sampling protocol for any talc mine?		X
Ever design an open pit mining operation?		X
Ever design an underground mining operation?		X
Ever supervise or consult on the ongoing operation of a mine?		X
Ever visit any J&J talc mines?		X
Ever conduct any field observations at any talc mines?		X
Ever conduct any field observations at any J&J talc mines?		X
Ever inspect any talc mines?		X
Ever inspect any J&J talc mines?		X
<del>Ever review petrographic maps from J&amp;J talc mines?</del>		
Ever review any geologic maps from a talc mine?	X	
Ever review any geologic maps from J&J talc mines?		X
Ever review any mine planning maps from a talc mine?		X
Ever seen the drill cores taken from a talc mine?		X
Ever seen the drill cores taken from J&J talc mines?		X
Ever review any mine planning maps from J&J talc mines?		X
Ever analyze any thin sections from cores removed from a talc mine?		X
Ever analyze any thin sections from cores removed from J&J talc mines?		X
Ever seen the results of an analysis of thin sections from cores removed from a talc mine?		X
Ever seen the results of an analysis of any thin sections from cores removed from J&J talc mines?		X



PLAINTIFF DEMONSTRATIVE 2

Ever inspect any core logs from a talc mine?		X
Ever inspect any core logs from J&J talc mines?		X
Ever Ask for any samples of J&J talc?		X
Ever taken any samples or rock specimens from a talc mine?		X
Ever taken any samples or rock specimens from J&J talc mines?		X
Ever conduct XRD on any J&J talc?		X
Ever conduct PLM on any J&J talc?		X
Ever conduct SEM on any talc?	X	X
Ever conduct SEM on any J&J talc?		X
Ever conduct TEM on any talc?		X
Ever conduct TEM on any J&J talc?		X
Ever seen test results from samples taken from J&J talc mines?		X
Ever designed or supervised a beneficiation process for talc ore?		X
Ever publish on talc deposits used to source J&J Talc in Italy, Vermont or China?		X
Ever publish on asbestiform amphiboles and talc?		X
Ever publish on asbestiform serpentines (chrysotile) and talc?		X
Ever publish on methodological approaches to differentiate asbestiform amphibole and non-amphibole minerals in talc?		X
Ever identify any asbestiform amphiboles in talc?		X



Plaintiff Dem.  
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# Exhibit P



Date	Exhibit #	Testing Entity	Author	Recipients	Purpose Stated	Test method	Mine	What was tested	Special Preparation	What tests revealed	Hopkins' Comments	Satisfies J&J Asbestos Defm
10/15/1957	J&J-309	Battelle	Smith					Italian talc		"the Italian talc averages about 10% fibrous or acicular particles"		
5/9/1958	J&J-1	Battelle	Smith	Dr. Lyan		petrograph	Val Chisone	processed talc-Italian		tremolite		
5/23/1958	J&J-2	Battelle	Smith	Dr. Lyan		microscope	Val Chisone	processed talc-Italian		tremolite; 6 to 10 % fibrous talc		
12/4/1970	J&J-9	Colorado School of Mines	Colorado School of Mines	Miller		XRD & petrograph	Hammondsville	38 core samples		tremolite-actinolite; fibrous talc		
3/9/1971	J&J-257	McCrone	Gieger	Goudie		SAED, XRD		Shower to Shower, medicated powder		"fiber of chrysotile... Was very clear"; "medicated powder we found one fiber of chrysotile"; Shower to Shower... we feel strongly that it may be chrysotile... chrysotile is very low"; >>> Final Report >>> "Shower to Shower The fiber content of Shower to Shower is quite low in comparison to previous samples which we have investigated... We found three suspect fibers. Of these, two were found in one field and probably have the same source, very possibly contamination... It is still questionable whether they are chrysotile. We have, however, found traces of chrysotile in G-11 one of the additives to Shower to Shower, and this might be a possible source of these contaminant fibers."	YES	
5/14/1971	J&J-255	J&J	Ashton	Smith		XRD		Baby Powder (production batch)		tremolite; tremolite-actinolite		
7/2/1971	J&J-256	Colorado School of Mines	Pattengill	Ashton		XRD; PLM		six monthly plant run samples		5 of 6 show tremolite-actinolite; "no other forms of non-talc minerals approaching asbestos types were identified"		
7/7/1971	J&J-15	Colorado School of Mines	Pattengill	Ashton		XRD	Vermont talc	processed talc-344-L		tremolite & actinolite		
7/29/1971	J&J-19	Colorado School of Mines, McCrone, Dartmouth	Nashed	Foster			Vermont talc			"trace amounts of fibrous minerals; (tremolite/actinolite) "		
10/12/1971	J&J-23	McCrone	Gieger	Goudie	appearance and fiber content	electron diffraction		Shower to Shower		traces of chrysotile in one of additives	YES	
11/11/1971	J&J-376	McCrone	Gieger	Goudie		TEM		Shower to Shower		"The Shower to Shower appeared to have a few more fibers than the other two samples. However I think that might be due to possible contamination from the G-11 in the G-11 we did find two positively identified chrysotile fibers and some other fibers which at first glance appeared to be chrysotile, when you look at the electron diffraction pattern. I believe that most of the fibers in Shower to Shower which are suspect may come from G-11... I left out the comments on G-11 from the report because I felt you might want to change your supplier or investigate your supplier, and this would only tend to confuse the issue perhaps with the FDA."		

**EXHIBIT**  
Hopkins-28  
Date: 11-5-78  
MLG, CSR, RPR, CRR

8/3/1972 J&J-28	NYU	Seymour Lewin	Dr. Weissler (FDA)			XRD	Shower to Shower sample 84	5% chrysotile; "About 1 fiber or rod/needle every 500 particles. Approx. 1/3 of these are tremolite...."		YES
8/10/1972 J&J-373	J&J					PLM	Shower to Shower			
8/24/1972 J&J-29	Sperry Rand	Nashed	Dr. R. A. Fuller	FDA submits Lewin sample		SEM	Shower to Shower	"asbestos fibers could be detected in the sample"; "reported chrysotile"		YES
8/31/1972 J&J-348	Sperry Rand	JJ Wehrung				SEM	Shower to Shower	Dr. Weissler used SEM "to study general shape of chrysotile asbestos." "Dr. Weissler he did find fibers which had the general shape of chrysotile." Also found "asbestos form fibers" in samples brought by JJ which were photographed."		
9/8/1972 D-7	Sperry Rand	JJ Wehrung				SEM	Shower to Shower	Observation of asbestos form "more correctly be called fiberform". SEM "very able to identify fiberforms which may be chrysotile"		
9/26/1972 J&J-31	Dr. Lewin	Dr. Nashed	Dr. Fuller				J&J Medicated Powder; Johnson's Baby Powder; J&J Shower to Shower; Johnson's Baby Powder batch # 108T & 109T (Lewin Samples)	Medicated Powder: tremolite 4% Baby Powder: 2.3% chrysotile Shower to Shower: 2.5% chrysotile		YES
10/27/1972 J&J-36,34,37	McCrone	Stewart	Goudie	"the presence of asbestiform minerals" mineralogy & occurrence of any asbestos type minerals		XRD, TEM		"Both samples contained an insignificant amount of tremolite;" tremolite rods		YES
2/26/1973 J&J-100	Colorado School of Mines	Reid	Ashton			XRD	processed talc	tremolite-actinolite; slight trace of anthophyllite? Chrysotile? "asbestos type materials"		YES?
4/26/1973 J&J-44	J&J	Petterson	Johnston			PLM	Hammondsville Powder	"tremolite or actinolite are identifiable (optical microscope) and these might be classified as asbestos fiber"		No
4/27/1973 J&J-335	J&J					optical microscope	Johnson's Baby Powder	Trace amounts of amphiboles in all samples. "The optical properties of the amphiboles are closer to actinolite than tremolite"		
5/1/1973 J&J-367		Miller	Petterson				Hammondsville ore	"the ore body contains tremolite"	Doesn't say which mine	
5/8/1973 J&J-368	J&J		Petterson				Hammondsville ore	"Your question this morning was how did Lewin assay timing relate to actinolite showings? Baby Powder lots 108T & 109T were alleged to contain asbestiforms by Lewin. Talc shipments checked by microscope here showed all lots clean just prior to and right after that time. the first showing of actinolite we know about is October 1972. The indications are that things were in good shape when Lewin picked up the above two lots for his assays."		
6/6/1973 J&J-47	Cardiff	Pooley	Ashton				our Vermont talc	actinolite		
9/6/1973 J&J-258	FDA	Stuart		"determination of asbestos"		XRD, PLM	Shower to Shower sample 84	"fibers of tremolite/actinolite"		Yes
12/21/1973 J&J-263	Colorado School of Mines	Reid	Ashton	"examined for chrysotile and/or tremolite"		TEM	Vermont talc samples	"identified chrysotile at a level of less than 10 ppm in the Vermont sample"		Yes







1/25/1977 J&J-141	Cardiff	Pooley		XRD		Vermont composite sample		fibers of antigorite composite samples-large and small fibrous tremolite		Source unknown-- Mr. Bicks says look in Metadata	YES?
6/14/1977 J&J-246	EMV			SEM; XRD		ore & product					
2/9/1979 J&J-164	George Lee's Group	Cohen			"airborne fiber concentrations"	66 composite samples		tremolite & actinolite			
9/1/1983 J&J-175	McCrone	Palenik	Miller	NIOSH method	Argonaut; Rainbow	air samples		Argonaut - 118 fibers; Rainbow- 2650 fibers	Type of fiber not specified	YES	
11/2/1984 J&J-179	McCrone	Palenik	Miller	TEM- EPA method		air samples		6,600 to 60,000 chrysotile asbestos fibers. All samples found asbestos		YES	
5/15/1985 J&J-177	MSHA	Olson		analysis for "asbestosiform minerals"	Italian talc	air samples at Cyprus South Plainfield		71.2% fibrous talc & "5.8% anthophyllite, an asbestosiform amphibole"		YES	
8/5/1986 J&J-184	McCrone	Laubenthal	Miller	PCM	Hammondsville	air samples		fibers in both samples	Type of fiber not specified	YES	
3/30/1987 J&J-185	J&J	Schmidt	Miller		Raymond Mill	Processed talc		"Tremolite is present in the fines (minus 100 plus 200 mesh) in six volume percent as free needles"			
4/15/1988 J&J-190	Skyline Laboratories; Aquatec Environmental			XRD	Chester/Hamm	random and composite process samples		actinolite			
2/25/1992 J&J-202	Cyprus	Munro			Argonaut; Hammondsville; Black Bear	ore		"fibrous tremolite was identified in exposures and cores at the east Argonaut 7 Black Bear mines. Cyprus staff report past tremolite from the Hammondsville and Clifton deposits."			
0/00/0000 J&J-298	McCrone					Windsor grade 35		chrysotile			
02/09/1979 J&J-341	J&J	Lee				Windsor 66 composite sample		"massive amphiboles in the 66 composite sample of Nov 6-10. the sample was forwarded to George Lee's group where the present of amphiboles was confirmed. They were identified as tremolite & actinolite"	duplicate of J&J 164		
05/09/1958 J&J-311	Battelle	Smith	J&J	Petrograph		Italian talc		"acicular and fibrous particles of talc"; the 8 to 10% of nonplaty talc is presumed to be derived from tremolite or enstatite"			
1/12/1984 J&J-305	McCrone	Palenik	Miller	PLM		Talc powder, grade EV		actinolite. The tremolite-actinolite in the sample is considered to be asbestos by current government regulations; however, it appeared to be cleavage fragments of the massive form rather than true asbestosiform. Typical tremolite fibers 3 to 10% non platy with trace amounts of tremolite			
1/24/1958 J&J-310	Battelle	Brown	Lycan J&J			Italian talc		"Four of the samples are suspected of containing tremolite based on the finding of one or two 'fibers' per sample which satisfy the color/morphology criteria"			
4/19/1973 J&J-296	J&J	Hamer		Dispersion staining		Johnson's Baby Powder					

4/27/1973	J&J-335	J&J	Colorado School of Mines						Petrographic optical microscope	Johnson's Baby Powder	"trace amounts of amphibole" in all 4 samples tested. "Shape- prismatic, columnar, parallel-sided rods." Size: from 20X4 microns to 200X30 microns; indentity - the optical properties of the particles are closer to actinolite than tremolite"		
7/05/1976	J&J- 303								optical microscope	Johnson's Baby Powder	"small (1%-2) amounts of amphibole needles."		
8/09/1972	J&J-342	J&J								Shower to Shower	"trace tremolite" in 1970 and 1971 samples	No chrysotile observed	
8/27/1973	J&J-299		Dutch consumer organization						electron microscope (REM)	Johnson's Baby Powder	"asbestos - content of 1.59%"		
9/11/1975	J&J-297		McCrone	Stewart	Zeltz					A-HC	chrysotile fiber	plate 4682 A-HC 51,000X Chrysotile fiber	
9/18/1961	J&J-313		Battelle	Smith	Ashton				petrograph	Hammondsville core	2 Percent non platy talc in upper core, 14% (granular and fibrous ) non platy talc with 1-2% altered amphiboles in lower core		
??/??/???			Dutch Consumers							Johnson's Baby Powder	claimed to have found asbestos		
??/??/1972	J&J-33		University of Minnesota					determine possible content of fibrous chrysotile asbestos	TEM	Shower to Shower	"Chrysotile asbestos does exist in the specimens of Shower to Shower"		
0/00/1991	J&J-327		Cypress							Argonaut mine Hamm mine	"Argonaut main ore body open pit - high incidence of fibre bearing zones encountered in the main ore body"		
0/00/1991	J&J-327		Cypress	Munro							"areas with fibrous actinolite"		
7/9/??	J&J-17		Mt. Sinai	J&J					electron microscopy	Johnson's Baby Powder	chrysotile asbestos		
10/27/1972	J&J-26	J&J		Nashed	Gouldie					Johnson's Baby Powder batch # 108T & 109T (Lewin Samples)	"There are trace quantities (tremolite) present confirmed both by McCrone & Bill Ashton. Levels are extremely low but occasionally can be seen optically. This is not new."		

# Exhibit Q



*R. J. Kerstetter*

MAR 25 1992

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CYPRUS ORE RESERVES - ARSENIC & TREMOLITE

*Excerpts from Cyprus Talc Reserve Report by R.C. Munro*

Geology & Environment

There are some important environmental issues related to the geology and mineralogy of the Cyprus talc deposits, particularly in Vermont.

Arsenic

Arsenic iron sulphides (arsenopyrite) are, with their alteration products, present in many of the talc-carbonate schist ore zones in the Vermont area. Total arsenic, as analyzed in the Ludlow Rainbow deposit, averages generally less than 100 ppm but with some small zones in excess of 1000 ppm. No apparent major effort is underway to regularly monitor or completely assess the total arsenic content of ores, tailing solids and wastes although the distribution of sulphides and arsenates in the talc ore system is generally understood.

In near surface weathering zones, crushed rock, stock piles and mine working areas, the arsenic sulphides (above) convert in part to the more soluble arsenates, for example, the hydrous nickel arsenate, annabergite (38%  $As_2O_5$ ). Soluble arsenic is measured in cores, ore samples, mill feed, product and tailings. Soluble arsenic content is monitored and governed under EPA/OSHA regulations.

High (e.g. + 6 ppm As) soluble arsenic contents of mill feed at the West Windsor mill contribute to reduced recoveries and milling rates. At West Windsor, part of the mill recovery problem at least is being ascribed to a high fines content in the feed and to low pH of the process water, both of which contribute to increased soluble As. The problem has been under study at West Windsor since 1987 by Mill Manager, Jeff Scott, who indicated that if the arsenic content is above + 6 ppm soluble As and the talc content falls below 62% talc production rates and recoveries can fall by 50%. The product specs are -3 ppm As or less at West Windsor and current material in the silos is measured at 0.73 ppm to 2.33 ppm soluble As.





for burial, have been measured at 0.33% to 0.70% tremolite by Three Forks and Alpine Mill Labs.

No fibrous material showed up in samples taken by the writer at the Western Source Red Hill mine in California, but minor tremolite is possibly present in the contact zone where it should be avoidable by selective mining.

Arsenic content (total and soluble) and the presence of fibrous minerals in exposed stockpiles and waste need to be checked at Alpine, Alabama and the now closed California properties operated by Cyprus in the past.

  
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/eji

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